

FILED
Clerk
District Court

MAR - 6 2008

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

GUIHUA BAI)	CIVIL ACTION NO. 07-0016
)	
Plaintiff)	
)	
v.)	
)	DECLARATION OF COUNSEL IN
GINTIAN CORPORATION, dba)	RESPONSE TO MOTION TO COMPEL
PRODUCTION REQUEST)	
LIGHT MESSAGE, ZHONG LI and)	
"MR. ZHU")	
Defendant.)	
)	
)	
_____)	

1. I am the attorney for defendants in this case.
2. I am responsible for the discovery responses in this case.
3. Although defendants initially objected to discovery on grounds that the parties had not consented to electronic service under FRCP Rule 5(b)(2)(D), the defense reconsidered its position and decided to provide discovery.
4. However, due to other matters on my calendar and schedule, I inadvertently delayed responding to the interrogatories and production requests not subject to a specific objection.
5. As of this date, interrogatory answers have been served and close to 700 pages of documents have been produced to plaintiff in response to the production request.

6. I apologize for the inconvenience to plaintiff and the court

I declare under penalty of perjury pursuant to the laws of the United States of America that the above is true and correct and execute this declaration on Saipan on this 6th day of March, 2008.

_____/s/_____
G. Anthony Long